

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
Robert J. Feinstein, Esq. (admitted <i>pro hac vice</i>)	
Bradford J. Sandler, Esq.	
Paul J. Labov, Esq.	
Colin R. Robinson, Esq.	
PACHULSKI STANG ZIEHL & JONES LLP	
780 Third Avenue, 34 th Floor	
New York, NY 10017	
Telephone: (212) 561-7700	
Facsimile: (212) 561-7777	
Email:	rfeinstein@pszjlaw.com
	bsandler@pszjlaw.com
	plabov@pszjlaw.com
	crobinson@pszjlaw.com
<i>Counsel to the Plan Administrator</i>	
In re:	Chapter 11
BED BATH & BEYOND INC., <i>et al.</i> , ¹	Case No. 23-13359 (VFP)
Debtors.	(Jointly Administered)

**CERTIFICATION OF NO OBJECTION REGARDING PLAN ADMINISTRATOR'S
OBJECTION TO CLAIMS FILED BY MING CHE**

1. On March 17, 2025, Michael Goldberg, solely in his capacity as the Plan Administrator (the "Plan Administrator") to 20230930-DK-Butterfly-1, Inc. (f/k/a/ Bed Bath & Beyond Inc.)² and affiliated debtors (the "Debtors") filed the *Plan Administrator's Objection to*

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtor's proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>.

² Pursuant to the Certificate of Amendment of the Certificate of Incorporation of Bed Bath & Beyond Inc., which was filed with the State of New York Department of State on September 21, 2023, the name of the entity formerly known as "Bed Bath & Beyond Inc." was changed to 20230930-DK-Butterfly, Inc. [Filing ID No. 230921001833 DOS ID 315602].

Claims Filed by Ming Che [Docket No. 3954] (the “Objection”) and Notice of Objection to Your Claim [Docket No. 3955] (the “Notice”).

2. Kroll Restructuring Administration LLC served the Objection and Notice on March 17, 2025, upon the parties listed in the *Affidavit of Service* [Docket No. 3972].

4. Pursuant to the Notice, the deadline for parties to file responses to the Objection was on April 15, 2025 (the “Objection Deadline”). No objections or responses to the Objection were filed on the docket on or before the Objection Deadline. As of the date hereof, the Plan Administrator has not received any informal responses to the Objection.

5. The proposed order (the “Proposed Order”) that was appended to the Objection is attached hereto as **Exhibit A**. The Plan Administrator respectfully requests that the Court enter the attached Proposed Order at the earliest convenience of the Court.

Dated: April 16, 2025

/s/ Colin R. Robinson

Robert J. Feinstein, Esq. (admitted *pro hac vice*)

Bradford J. Sandler, Esq.

Paul J. Labov, Esq.

Colin R. Robinson, Esq.

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New York, NY 10017

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Counsel to the Plan Administrator

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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Bradford J. Sandler

Paul J. Labov

Colin R. Robinson

PACHULSKI STANG ZIEHL & JONES LLP

780 Third Avenue, 34th Floor

New York, NY 10017

Telephone: (212) 561-7700

Facsimile: (212) 561-7777

bsandler@pszjlaw.com

plabov@pszjlaw.com

crobinson@pszjlaw.com

Counsel to the Plan Administrator

In re:

BED BATH & BEYOND INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

(Jointly Administered)

**ORDER SUSTAINING PLAN ADMINISTRATOR'S OBJECTION TO
CLAIMS FILED BY MING CHE**

The relief set forth on the following pages, numbered two (2) through three (3), is

ORDERED.

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>.

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Debtors: BED BATH & BEYOND INC., *et al.*

Case No. 23-13359-VFP

Caption of Order: ORDER SUSTAINING PLAN ADMINISTRATOR'S OBJECTION TO CLAIMS FILED BY MING CHE

Upon the objection (the “Objection”)¹ of the Plan Administrator, pursuant to sections 105 and 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rules 3007-1, 3007-2, and 9013-1, seeking entry of an order (this “Order”) disallowing the Disallowed Claims and reclassifying the Reclassified Claim as a Class 6 General Unsecured Claim and upon consideration of the record of these chapter 11 cases and the *Declaration of Michael Goldberg* in support thereof; and the Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and venue being proper before this Court; consideration of the Objection and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Objection is in the best interests of the Debtors’ estates, their creditors and all parties in interest, and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

IT IS HEREBY ORDERED THAT:

1. The Objection is sustained.
2. The following claims are disallowed and expunged: Claim 4443, Claim 4519, Claim 4520, Claim 4775, Claim 4841, Claim 4938, Claim 5173, Claim 6149, Claim 6171, Claim 6662, Claim 7440, Claim 7441, and Claim 8492 (the “Disallowed Claims”).

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.

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Debtors: BED BATH & BEYOND INC., *et al.*

Case No. 23-13359-VFP

Caption of Order: ORDER SUSTAINING PLAN ADMINISTRATOR'S OBJECTION TO CLAIMS FILED BY MING CHE

3. The following claims are reclassified in their entirety as Class 6 General

Unsecured Claims: Claim 8343 (the "Reclassified Claim").

4. The Claims and Noticing Agent is authorized to modify the Claims Register to reflect the relief granted by this Order.

5. Notwithstanding any applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, or the Local Rules, this Order shall be effective immediately upon its entry.

6. The Court shall retain jurisdiction to construe and enforce this Order.